

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF FLORIDA

Case No. 25-20167-Cr-BLOOM/ELFENBEIN

UNITED STATES OF AMERICA

v.

JESSIE BLEDSOE ,

Defendant.

\_\_\_\_\_ /

**STIPULATED FACTUAL BASIS**

The United States and JESSIE BLEDSOE (“the defendant”) hereby stipulate and agree that had this matter proceeded to trial, the United States would have offered evidence and testimony sufficient to establish a factual basis beyond a reasonable doubt for the crime charged, including the following:

**Miami-Dade County and its Relevant Departments**

Miami-Dade County (“Miami-Dade”) was a political subdivision of the State of Florida located within the Southern District of Florida that was subject to the laws of the State of Florida and the United States. In addition, Miami-Dade was a local government that received benefits in excess of \$10,000 under a Federal program involving a grant, contract, subsidy, loan, guarantee, insurance, and other form of Federal assistance during the one-year period of calendar year 2021 and the one-year period of calendar year 2022.

Miami-Dade’s county government included numerous departments carrying out the county’s functions in providing a variety of services. Each of these departments was

within the overall control of the Miami-Dade county government. These departments included the Miami-Dade Department of Transportation and Public Works ("Miami-Dade Transit") and the Miami-Dade Finance Department ("Miami-Dade Finance"). Contracts with suppliers, contractors, and vendors to obtain materials and services for Miami-Dade Transit were entered by Miami-Dade acting through Miami-Dade Transit. Payments due to suppliers, contractors, and vendors pursuant to these contracts were made by Miami-Dade Finance.

Among other functions, Miami-Dade Transit was responsible for developing, coordinating, and operating Miami-Dade's various transportation networks, including the Metrorail system. Miami-Dade's Metrorail system consisted of approximately 25 miles of dual elevated commuter rail track serving various areas of Miami-Dade via a number of different lines and routes. The Track and Guideway unit of Miami-Dade Transit was responsible for both the structural maintenance of the Metrorail facilities, such as stations and garages, and for the maintenance and repair of the Metrorail lines, including the repair and replacement of the track, ties, fasteners, and switches used by the Metrorail system.

#### **The Defendant and Other Relevant Individuals and Entities**

The defendant was a resident of North Dakota and the operator and co-owner of JB Railroad Contracting, Inc. ("JB Railroad"). JB Railroad was a North Dakota-based company that did track and rail replacement, repair, and maintenance work throughout the United States, including on the Metrorail system pursuant to contracts entered into with Miami-Dade through Miami-Dade Transit.

Dale Robinson ("Robinson") was the acting General Superintendent and lead Rail

Structure and Track Supervisor in the Track and Guideway unit of Miami-Dade Transit. Robinson's responsibilities included making recommendations regarding contractors as part of the process used to select contractors to do maintenance and repair work on the Metrorail lines, as well as the supervision and inspection of work done by contractors for Miami-Dade Transit. As an employee of Miami-Dade Transit, Robinson was an agent of Miami-Dade.

Marcia Robinson was an individual residing in Maryland. Marcia Robinson was the defendant's wife. *Date Robinson's 28 5213 RRS* Tailored Railroads & Consulting LLC ("Tailored Railroads") was a Maryland Limited Liability Company established on or about January 29, 2021, by Marcia Robinson, who filed the Articles of Organization for Tailored Railroads and was its sole Authorized Person and Resident Agent.

#### **The Relevant Miami-Dade Transit Contracts with JB Railroad**

As part of its operations, Miami-Dade Transit entered contracts with outside companies to provide various services necessary for the safe and efficient operation, repair, replacement, and maintenance of the Metrorail track and other facilities. While Miami-Dade Transit generally used a competitive bidding process for the selection of contractors, due to the disruption caused by the COVID-19 pandemic, at various times during 2020 and 2021, Miami-Dade Transit instead employed emergency procurement bid waivers and selected contractors without any competitive bidding process.

In or around May 2020, Miami-Dade, through Miami-Dade Transit, entered into an Emergency Metrorail Track Fastener Replacement Contract with JB Railroad for the removal and replacement of track fasteners on the Metrorail track. On or about February

18, 2021, a third purchase order was issued to JB Railroad under an extension of this contract for the removal and replacement of an additional 25,000 track fasteners in exchange for an additional payment of \$1,500,000 upon completion of the work. JB Railroad submitted invoices and received payment for the work done under this third purchase order during the period of on or about March 4, 2021 through on or about July 9, 2021. The payments sent to JB Railroad by Miami-Dade Finance for work done under this third purchase order totaled approximately \$1,500,000.

On or about February 9, 2021, JB Railroad submitted a bid to Miami-Dade to do thermite welding work for Miami-Dade Transit under Contract 9418-0/16. On or about February 26, 2021, a purchase order was issued to JB Railroad under this contract to do 200 thermite welds and related rail changes in exchange for the payment of up to \$305,100. JB Railroad submitted invoices and received payment for the work done under this purchase order during the period of on or about May 4, 2021 through on or about March 21, 2022. The payments sent to JB Railroad by Miami-Dade Finance for work done under this purchase order totaled approximately \$207,240.

**Dale Robinson Solicits Money from Defendant Jessie Bledsoe**

In or around January 2021, prior to the issuance of the above-referenced third purchase order for the removal and replacement of Metrorail track fasteners and the above-referenced purchase order to do thermite welding and rail changes, Robinson solicited money from the defendant intending to be influenced in connection with his part of the selection process relating to the contracts and purchase orders that JB Railroad was receiving to do that work for Miami-Dade Transit. The defendant agreed to pay

Robinson in a concealed fashion by making payments from the account of JB Railroad to an entity specified by Robinson.


After this, also in or around January 2021, Robinson directed Marcia Robinson to create Tailored Railroads and to open a company checking account in the name of Tailored Railroads on which she would serve as the sole signatory. Robinson then provided the information about Tailored Railroads to the defendant so that the defendant could disguise the payments intended for Robinson's personal benefit by making them via checks from JB Railroad to Tailored Railroads.

During the period of February 2021 through February 2022, Robinson caused a total of four invoices to be sent from Tailored Railroads to JB Railroad. The defendant then caused JB Railroad to issue checks to Tailored Railroads to pay these invoices, even though Tailored Railroads provided no goods or services to JB Railroad. A total of four checks were issued from JB Railroad to Tailored Railroads during the period of February 2021 through March 2022 to pay these invoices. These four checks totaled approximately \$75,956, the amount that the defendant ultimately provided to Tailored Railroads for the benefit of Robinson in response to Robinson's solicitation for money.

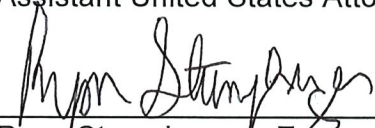
### Conclusion

The above-described activities took place in Miami-Dade County in the Southern District and elsewhere during the timeframe as alleged in the Information. In addition, the United States and the defendant agree that this Stipulated Factual Basis, while not containing all facts known to the United States, is sufficient to satisfy all the elements establishing the guilt of the defendant for the crime charged in the Information.


Date: 5/9/25

HAYDEN P. O'BYRNE  
UNITED STATES ATTORNEY  
By:   
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Edward N. Stamm  
Assistant United States Attorney

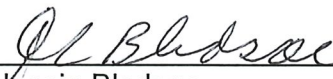
Date: 5/8/25

By:   
\_\_\_\_\_  
Ryan Stumphauzer, Esq.  
Attorney for Defendant Jessie Bledsoe

Date: 5/8/25

By:   
\_\_\_\_\_  
Matthew DellaBetta, Esq.  
Attorney for Defendant Jessie Bledsoe

Date: 5-8-25

By:   
\_\_\_\_\_  
Jessie Bledsoe  
Defendant